

Modern Slavery Statement

1 July 2024 - 30 June 2025

Introduction

Gadens' Modern Slavery Statement (**Statement**) is made in accordance with Section 14 of the Modern Slavery Act 2018 (Cth) (the Act) and constitutes Gadens' Statement for the financial year ended 30 June 2025 (**Reporting Period / FY25**). This Statement covers the Australian business operations of Gadens (ABN 29 991 935 627) and its associated entities (collectively **Gadens / Firm / we / us / our**).

This is our third Statement and details the efforts made during the Reporting Period to identify, assess and address modern slavery risks across our business and supply chain. This Statement details our focus areas for FY26, including the key activities through which Gadens will address the risk of modern slavery in our business and supply chain.



Structure and operations

Our structure and reporting entities

Gadens (the **Gadens Partnership**) and Eltav Investments Pty Ltd (ABN 18 652 146 776), which provides business support services exclusively to the Gadens Partnership, operate collectively under the trading name **Gadens**.

We operate exclusively from within Australia, and each entity has its own employees and suppliers. For convenience, any reference to Gadens refers collectively to both entities unless otherwise specified.

Post-Reporting Period events

Effective 1 December 2025, Gadens will open a new office in Perth. For the reporting period that will end on 30 June 2026, Gadens will operate out of offices located in Adelaide, Brisbane, Canberra, Melbourne, Sydney and Perth. This Statement does not cover Gadens (Perth) as this office was not operating during the Reporting Period.

Our vision and purpose

Our vision is to be recognised as a leading independent Australian law firm, trusted for our integrity and valued for our impact. We exist to help our clients succeed in a complex world.

This vision shapes our strategy and culture. It guides how we work together, how we support our clients, and how we uphold the highest standards in everything we do.

Our operations

Gadens is an independent Australian law firm with a proud history dating back to 1847.

Our purpose is clear: we deliver specialist legal services that help our clients navigate complexity and achieve clarity. Our expertise encompasses banking and finance, corporate advisory, disputes and investigations, government, intellectual property and technology (including data, cyber, and privacy), private clients, real estate and construction, planning and environment, recovery and insolvency, tax, and workplace advisory.

We work alongside a diverse range of clients – Australian and multinational organisations, small and medium-sized businesses, and high-net-worth families and individuals – providing both strategic guidance and practical legal support across industries.

At the close of the reporting period, we had 694 people working from offices in the central business districts of Adelaide, Brisbane, Canberra, Melbourne, and Sydney. The majority our people are legal practitioners, supported by dedicated business professionals in finance, compliance and risk, information technology, operations, business development and marketing, and people and development. Together, we are committed to acting with integrity and making a positive impact for our clients, our communities, and each other.

Supply chain

As providers of legal services and officers of the courts of Australia, we have a fundamental duty to the administration of justice.

Gadens supports and respects the protection of human rights, and as a firm is committed to achieving the highest standard of behaviour. Our professional obligations to act ethically, diligently and with integrity are reflected in all our business dealings and relationships, and we have the same expectations of our suppliers.

We do not tolerate abusive or unfair treatment of anyone and are committed to taking necessary steps, including in relation to suppliers, to ensure that slavery and human trafficking play no part in our business or supply chain.

Our approach to supplier selection and engagement

We engage with suppliers who share our values and deliver products and services of exceptional quality. We prioritise reputable, locally based suppliers who demonstrate a clear commitment to managing modern slavery risk in their own operations and supply chains.

We acknowledge that, despite our efforts, there remains a risk of association with modern slavery practices – particularly through the extended supply chains of our suppliers and the decentralised nature of some procurement processes.

We acknowledge that the total eradication of modern slavery risks from within our supply chain may never be possible and that our purchasing activities may continue to have various ethical, economic, social and environmental impacts. However, we are comfortable that our risk assessment is robust, and that our controls and processes are effective and proportionate to the risks within our operations. We remain vigilant and proactive, continuously reviewing and strengthening our

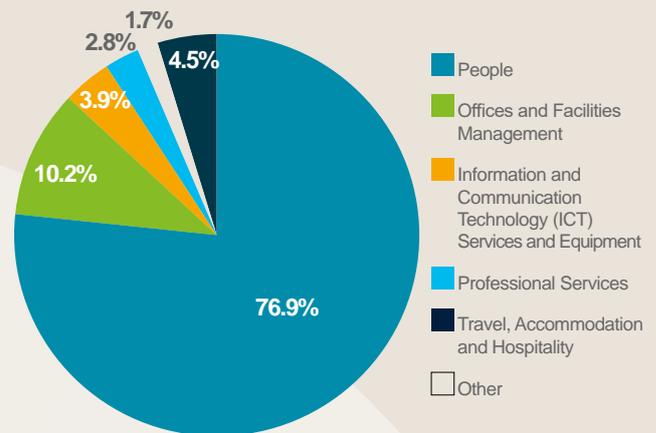
approach to supplier engagement and risk mitigation. Addressing and reducing the risk of modern slavery in our business and supply chain is an ongoing priority for Gadens.

Material supply chain categories

In FY25, Gadens' most significant procurement spend related to the employment of our people. The second largest procurement spend category was for products and services in various functional areas to support our people in the provision of legal services.

A detailed breakdown of these categories is provided in the chart and accompanying table below.

Supply chain categories | Procurement spend %



These categories represent 100% of our total spend for FY25, which is consistent with prior years. There was no material change to the nature of our supply chain between FY24 and FY25, or during the Reporting Period.

Functional area	Description of supply
People	The people we employ to deliver a quality service offering to clients or support the delivery of these services. Remuneration paid to our people is the largest expense in our supply chain. All our partners and staff are over the age of 18 and have Australian working rights.
Offices and facilities management	The commercial office space we lease from top-tier commercial landlords to accommodate our people and operate our business from. This includes fit out costs, maintenance, utilities, cleaning and security.
Information and communication technology (ICT) services and equipment	The systems, software and equipment that are necessary to maintain the technology infrastructure that supports our business. It includes both hardware and software.
Professional services	The services we acquire from others including external training services, external consultants and contractors, recruitment services and legal support services.
Travel, accommodation and hospitality	The service providers we use to organise, book and facilitate our travel and accommodation requirements. This category also includes meals and other hospitality enjoyed by our people while travelling on business as well as client entertainment expenses.
Other	Additional products and services relevant to our business, including financial services and insurance, marketing and merchandise, office stationery and legal disbursements. Legal disbursements relate to products and services that we procure from third parties on behalf of clients and the cost of which is 'passed through' to clients as a disbursement at cost (for example, barristers, expert witnesses, title and other searches, registration fees etc.).

Modern slavery risk management

Procurement and supplier governance

Our values bind all our people and underpin everything we do. We have embedded the following policies relevant to procurement and supplier governance into our procedures and workflow:

- Anti-bribery and corruption
- Anti-discrimination and appropriate workplace behaviour
- Anti-money laundering and counter-terrorism
- Compliance with regulatory obligations
- Conflicts of interest
- Equitable briefing
- Gifts, benefits and hospitality
- Occupational health and safety
- Overtime
- Travel and accommodation
- Workplace bullying
- Work experience.

The procurement of high-quality products and services is essential for enabling us to deliver exceptional legal services to our clients. We procure goods and services from a vast number of suppliers, many of which have their own code of conduct unique to that entity and its operations. We ensure, wherever possible, that our firm interacts with reputable suppliers and contractors who share our values. We have also sought to align ourselves with suppliers that support our sustainability and social impact vision and goals.

The following processes are followed when considering a potential new supplier:

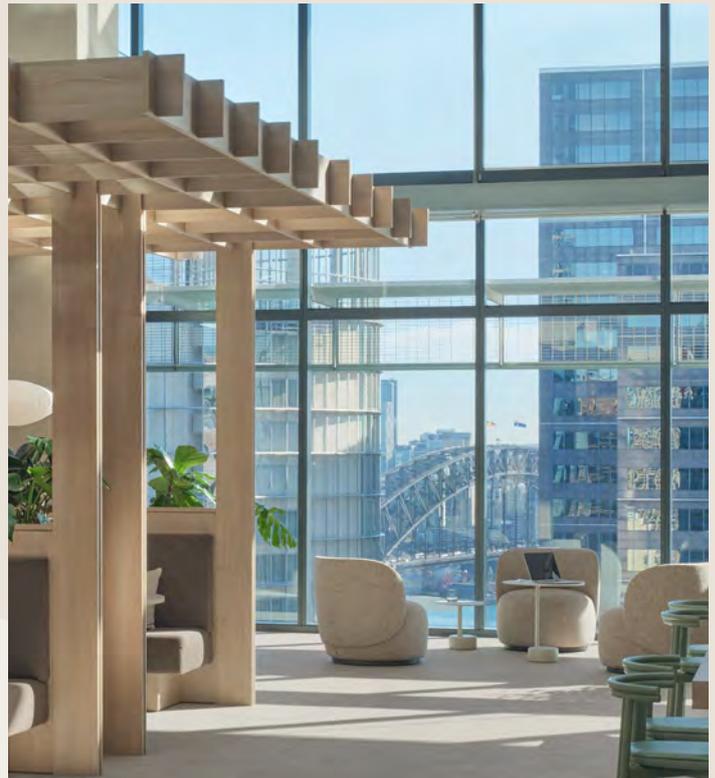
1. the type of product or service provided;
2. the location of the supplier, including with reference to any sanctions or embargoes;
3. any reputational or other issues available or known about the supplier at that point in time; and
4. verification of the supplier's commitment to managing modern slavery within their own business and supply chains and/or compliance with applicable requirements.

Identification of modern slavery risk

Gadens acknowledges that the recognition and mitigation of modern slavery risk is fluid and requires ongoing attention. We continue to take proactive steps to build upon our efforts and activities undertaken during FY23 and FY24 to identify and manage exposure to modern slavery risks.

During FY23, an initial assessment of our business operations and internal procurement and supplier processes was undertaken to determine our level of modern slavery risk. At that point in time, we identified and assessed 155 ongoing suppliers across our material supply chain categories.

Our business operations are limited to Australia, and 69% our supply chain is based in Australia. Of the remaining suppliers, 27% are based in the United States of America or United Kingdom, with the balance (4%) based in other countries that are rated as low risk of modern slavery practices by the [Walk Free Foundation's Global Slavery Index \(GSI\)](#). These countries include Canada,



Germany, Finland and Ireland. The majority of our supplier relationships are long-standing and we prioritise the engagement of suppliers who are Australian-based.

Even though Gadens undertook mergers in July and October 2024, this assessment was not undertaken in FY25 as there continued to be no material change to the nature of our supply chain. We will undertake a review during FY26 as we continue to assess and refine the suppliers that we engage with.

Risk exposure

Given the nature of our business and the products and services we procure to support the provision of legal services, the risk that we have caused or contributed to modern slavery in our supply chain during the Reporting Period is low. This assessment is based on the analysis of our business operations and material supply chain, and the regulated nature of the legal services profession in Australia.

We understand that our tier-one and tier-two suppliers may source goods and services from international jurisdictions, thereby increasing the risk of modern slavery, particularly in the ICT sector. To reduce this risk, we continue to prioritise reputable, Australian-based suppliers who can verify their commitment to managing modern slavery risk in their business practices and supply chains.

Actions taken to mitigate modern slavery risk

During FY25, Gadens prioritised the following actions to mitigate the risk of modern slavery occurring within our business operations and supply chain:

- Maintaining a database of our current ongoing supplier network, including geographic location, supplier category and type of product or service provided.
- Critically assessing new material suppliers and limiting the firm's engagement to competent, reputable, and (where possible) Australian-based, service providers and suppliers if new suppliers are required to be onboarded.

- Continued screening of all new suppliers for risk of modern slavery within their business operations, including financial checks, data security assessments, reference checks, obtaining/sighting of copies of relevant documents, site inspections/audits and/or modern slavery risk assessments. These checks, by necessity, vary based on the industry of the supplier.
- Continued developing a Supplier Risk and Governance (SRG) Program to ensure all new and existing suppliers are regularly assessed for, among other things, modern slavery risks in their supply chain.
- Streamlining our recruitment processes, onboarding and people management policies, prioritising internal recruitment processes wherever possible and only using reputable recruitment agencies if external assistance was required.
- Maintaining compliance with all laws and regulations for workplace health and safety and the promotion of flexibility and work-life balance for all staff.
- Participation of our people in relevant training programs covering issues and policies related to modern slavery and the identification of potential risks or unsafe practices.
- Finalising our Whistleblowing Policy, setting out the circumstances in which our people and contractors can make a whistleblowing disclosure safely, confidentially, whilst maintaining their anonymity; detailing how Gadens will deal with a disclosure once made and the protection available for the whistleblower; and providing for suspected instances of modern slavery to be reported.

Monitoring and measurement

We did not identify any modern slavery incidents during FY25. This evaluation is based on ongoing assessment of our current suppliers, the product and service categories we procure, the locations from which we procure these products and services and our current procurement practices.

In FY26, we will implement a range of measures to strengthen the management and oversight of modern slavery risks across our supply chain, as outlined below.



Continuous improvement activities

Gadens is committed to continually improving our practices to ensure that there is no modern slavery or human trafficking in our supply chain. For FY26, our key priorities for addressing modern slavery within our supply chain will encompass the following areas:

- Finalising and implementing a new Procurement Policy for the purchase of products and services. The policy will establish the minimum standards of conduct we require from our suppliers including, but not limited to, the responsible management of modern slavery risks within their supply chains and the procurement of carbon neutral products and services. The policy will outline opportunities for consolidating expenditure with key suppliers and managing risks throughout our supply chain.
- Finalising and implementing a robust Supplier Procurement Risk Framework and an SRG Program for initial and ongoing risk assessments of existing and potential suppliers and contractors within our Procurement Policy. Assessments will involve due diligence screening and scrutinisation of supplier operations including country of origin of goods, services, employees and sources of funding.
- Centralising procurement processes for suppliers within our Operations team. Each functional area will have a dedicated lead, responsible for procurement of suppliers, conducted in accordance with the SRG Program and in compliance with the Procurement Policy and Supplier Procurement Risk Framework.
- Refining our list of suppliers and contractors nationally, ensuring that they are fit for purpose.
- Reworking our mandatory due diligence training program for all employees to include dedicated modern slavery awareness modules, alongside training on the operation of Gadens' Procurement Policy, Supplier Procurement Risk Framework and SRG Program.
- Including anti-modern slavery and human trafficking contractual clauses in all new contracts and agreements for products and services categorised under our SRG Program as high risk.

Consultation and approval

This Statement was prepared by the Chief Operating Officer, with support from the Head of Sustainable Business and Risk and Compliance function in the Office of the General Counsel (**OGC**).

This Statement was approved by the Board of Gadens on 16 December 2025. A copy of the Statement is published on our website, and on the Australian Modern Slavery Statement Register as maintained by the Australian Government's Attorney-General's Department.

For any questions relating to this Statement, please contact the Office of General Counsel via email to notices@gadens.com.

Signed by Jeremy Smith, the Chair of the Board, being the designated and responsible person for each of the reporting entities.

Jeremy Smith, Chairman

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